

SUPPLEMENTAL BASIS STATEMENT  
CHAPTER 129 SURFACE COATING FACILITIES  
January 6, 2011

Commenters

1. Anne Arnold  
Region 1 EPA  
Boston, Mass.
2. Dave Darling  
American Coatings Association (ACA)  
Washington, DC

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General

1. Comment: Maine's proposed revisions to Chapter 129 are consistent with EPA's VOC content limits given in the Control Technique Guideline (CTG) for flat wood paneling and metal furniture coating operations issued in 2006 and 2007, respectively. However, Chapter 129 also includes emission limits for miscellaneous metal parts and products coating operations for which EPA issued an updated CTG in 2008. Therefore, Maine should also update the Chapter 129 miscellaneous metal and plastic parts coating emission limits to reflect the 2008 CTG. (commenter 1)

*Response: The Department is aware that Chapter 129 must be updated to incorporate the Miscellaneous Metal and Plastic Parts Coatings CTG limits. The Department expects the miscellaneous metal and plastics parts 2008 CTG will affect a larger group of sources and plans to incorporate this CTG at a later date when more time can be given to notifying stakeholders.*

Emission limits

2. Comment: It appears that Maine is proposing more stringent limits in Table 1 and Table 2 for surface coating of metal furniture. Specifically, Maine is proposing limits lower than the EPA CTG for Metallic and Pretreatment Coatings (3.0 lb/gal versus the EPA CTG 3.5 lb/gal for baked and air dried coatings). In addition, 5.1 lb/gal versus the CTG limit of 6.7 lb/gal for baked and air dried coatings expressed in terms of mass of VOC per volume of solids applied. It is difficult to track each and every state surface coating rule, as such ACA has been asking States to adopt limits as consistent as possible to the EPA CTG. ACA requests Maine adopt the EPA CTG limits for the Metallic and Pretreatment Coatings. (commenter 2)

*Response: The Department accepts the commenter's suggestion to use the EPA CTG limits for Metallic and Pretreatment Coatings (3.5 lb/gal for baked and air dried coatings*

*expressed in terms of VOC per volume of coating and 6.7 lb/gal for baked and air dried coatings expressed in terms of mass of VOC per volume of solids applied). The Department requested and received information from the American Coatings Association that estimates the general one component and general multi-component make up approximately 70% of the coatings used in metal furniture, with extreme high gloss and extreme performance combined for 10%, pretreatment 10%, metallic 5% and the remaining categories 5% of total coatings used. The Department agrees that the larger categories (one component and multi-component general use coatings) that are more stringent than the current rule more than off-set the relaxation in the specialty coatings.*